

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Roger C. by and through his)
next friend, Shelley Gilbert)
Plaintiff,)Civil Action: 08cv1254
v.)Judge St. Eve
)Magistrate Judge Schenkier
Valley View Public School District, 365-U)
Alan Hampton, Bollingbrook Police)
Don Laverty)
Timothy Gavin)
Steven Prodehl)
Defendants.)

**MOTION FOR AN ORDER TO VALLEY VIEW SCHOOL DISTRICT
TO MAKE A PLACEMENT OF PLAINTIFF IN ACCORDANCE WITH
"FAPE"; THE REQUIREMENTS OF 20 U.S.C. 1412(a)(1) & 1414(1)(a);
& A PLACEMENT THAT IS GEOGRAPHICALLY PRACTICAL SO
TO ENABLE PLAINTIFF'S EXERCISE OF HIS PROPERTY RIGHT
TO A PUBLIC EDUCATION**

NOW COMES [child] Plaintiff Roger C. with his next friend Shelley Gilbert and both represented by their attorney, Christopher C. Cooper. Through counsel, they state as follows:

The Court is respectfully asked: (1) to order the Defendant School District to conduct an IEP pursuant to [the] IDEA; (2) To order the Defendant School District to make a placement of Roger within the meaning of FAPE; (3) To order the Defendant School District to make a placement that comports with the requirement of 20 U.S.C. 1412(a)(1); and (4) To order the Defendant School District to make a placement that does not interfere, by way of logistical obstacle (e.g., transportation), with the plaintiff's property right to a public education.

Respectfully submitted,
s\Christopher Cooper, ESQ., PHD., 22 August 2008
Counsel for Plaintiff
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PROOF OF SERVICE: I, the undersigned, swear that I transmitted the foregoing through ECF on August 22, 2008 and that the defendants' attorneys are registered e-filers. s\Christopher C. Cooper